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11 **UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

13 THE NEXT VIETNAM PROJECTS
FOUNDATION, INC.; RADIX
14 FOUNDATION A/K/A VIETNAM
VETERANS FOR FACTUAL HISTORY;
15 SAIGON BROADCASTING
TELEVISION NETWORK, INC.; MY
16 VAN INTERNATIONAL, INC.; NAM
PHAM; CARINA OANH HOANG; DIEP
17 PHAN; TRONG PHAN; SON NGUYEN;
THANH-PHUONG LE and MINH
18 NGUYEN,

19 Plaintiffs,

20 v.

21 KOSTER FILMS, LLC; FREDERICK
KOSTER, BT PRODUCTIONS, LLC and
22 BRIAN TOOKER,

23 Defendants.

Case No. 8:22-cv-02130-JWH-DFM

**PLAINTIFFS AND COUNTER-
DEFENDANTS' NOTICE OF
MOTION AND MOTION TO
STRIKE DEFENDANT AND
COUNTERCLAIMANT
FREDERICK KOSTER'S
AMENDED COUNTERCLAIM
FOR CONVERSION PURSUANT
TO CCP § 425.16 OR, IN THE
ALTERNATIVE, TO DISMISS
PURSUANT TO FRCP 12(B)(6);
MEMORANDUM OF POINTS
AND AUTHORITIES IN
SUPPORT THEREOF**

Date: October 20, 2023
Time: 9:00 a.m.
Courtroom: 9D
District Judge: Hon. John W.
Holcomb
Mag. Judge: Hon. Douglas F.
McCormick

Complaint filed: Nov. 23, 2022

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PLAINTIFFS' NOT. OF MOT. AND MOT. TO STRIKE DEFENDANT FREDERICK KOSTER'S
COUNTERCLAIMS; MPA IN SUPPORT THEREOF

1 FREDERICK KOSTER, an individual,
2 Counterclaimant,
3 v.
4 NEXT VIETNAM PROJECTS
FOUNDATION, INC., et al.,
5 Counter-Defendants.

6
7 TO: ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

8 TO: ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

9 PLEASE TAKE NOTICE that on October 20, 2023, at 9:00 a.m., or as soon
10 thereafter as the matter may be heard by Honorable John W. Holcomb, in Courtroom
11 9D, 9th Floor, of the United States District Court for the Central District of California,
12 located at the Ronald Reagan Federal Building and U.S. Courthouse, 411 W. 4th Street,
13 Santa Ana, CA 92701, Plaintiffs and Counter-Defendants The Next Vietnam Projects
14 Foundation, Inc., Radix Foundation a/k/a Vietnam Veterans for Factual History,
15 Saigon Broadcasting Television Network, Inc., My Van International, Inc., Nam Phan,
16 Carina Oanh Hoang, Diep Phan, Trong Phan, Son Nguyen, Thanh Phuong Le and
17 Minh Nguyen's (collectively, "Plaintiffs") will, and hereby do, move to strike the
18 amended counterclaim for conversion asserted by Defendant and Counterclaimant
19 Frederick Koster ("Defendant") pursuant to California Code of Civil Procedure section
20 425.16 (the "anti-SLAPP statute"). In the event that Plaintiffs prevail on this Motion,
21 they respectfully request leave to file a motion for attorneys' fees for the fees to which
22 they would be entitled as the prevailing party under the anti-SLAPP statute.

23 Should the Court decide that the anti-SLAPP statute does not apply to the
24 counterclaim, Plaintiffs move, in the alternative, to dismiss the counterclaim for
25 conversion pursuant to Federal Rule of Civil Procedure Rule 12(b)(6) on the grounds
26 that Defendant fails to state a claim upon which relief can be granted.

27 This Motion is based on this Notice of Motion and Motion, the Memorandum
28

1 of Points and Authorities in support of the Motion, the Declaration of Jacob Kevin
2 Poorman, the pleadings and papers on file in the above entitled action, and upon such
3 other points and authorities, arguments, and written and/or oral evidence as the Court
4 may deem fit to consider at the hearing.

5 This Motion is made following ongoing discussions between counsel regarding
6 Defendant's counterclaim for conversion and Plaintiffs' intent to move to strike that
7 claim under the anti-SLAPP Statute or, in the alternative, to dismiss it. *See* Declaration
8 of Jacob Kevin Poorman in support of Plaintiffs' Motion to Strike.

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1 Plaintiffs and Counter-Defendants The Next Vietnam Projects Foundation, Inc.,
 2 Radix Foundation a/k/a Vietnam Veterans for Factual History, Saigon Broadcasting
 3 Television Network, Inc., My Van International, Inc., Nam Pham, Carina Oanh
 4 Hoang, Diep Phan, Trong Phan, Son Nguyen, Thanh Phuong Le and Minh Nguyen's
 5 (collectively, "Plaintiffs") respectfully submit the following Motion to Strike, or in
 6 the Alternative to Dismiss, Defendant and Counterclaimant Frederick Koster's
 7 ("Defendant") Amended Counterclaim for Conversion.

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 **I. INTRODUCTION**

10 The Amended Counterclaims allege two causes of action – one for conversion
 11 and one under 17 U.S. Code § 512(f). The counterclaim for conversion, which
 12 Defendant previously alleged, is based on allegedly false DMCA copyright takedown
 13 notices sent by Plaintiff Minh Nguyen and settlement communications relating to this
 14 litigation. Both of these alleged acts are protected by California's anti-SLAPP statute
 15 because they constitute communications that were made "in connection with an issue
 16 under consideration or review by a . . . judicial body," pursuant to Cal. Code of Civ.
 17 Proc. 425.16(e)(2). It is therefore Defendant's burden to show that he has a likelihood
 18 of prevailing on his counterclaim for conversion. He will, however, be unable to carry
 19 this burden because the conversion counterclaim is barred by California's robust
 20 litigation privilege. Communications – like those alleged in support of the conversion
 21 counterclaim here – that are made in connection with a judicial proceeding, by
 22 interested parties to achieve the objects of the litigation, are immune from liability in
 23 California. *See* Cal. Civil Code § 47(b). This Court should therefore strike the
 24 conversion counterclaim pursuant to California Code of Civil Procedure
 25 § 425.16(b)(1). In the event the Court does not find that the conversion counterclaim
 26 is subject to the anti-SLAPP statute, Plaintiffs respectfully request, in the alternative,
 27 that the Court dismiss the counterclaim pursuant to Rule 12(b)(6) for failure to state a
 28 claim upon which relief could be granted.

1 **II. BACKGROUND**

2 Defendant Koster represented and agreed that, in exchange for \$250,000, he
3 would help create a film (the “Film”; which was entitled “Through Our Eyes: The
4 Vietnam War”) that was intended to tell the story of the Vietnam war from the South
5 Vietnamese perspective. As part of this agreement, Defendant Koster promised,
6 among other things that:

- 7 • The Film would be distributed for free, for educational purposes;
- 8 • All rights to the Film and related materials would belong to Plaintiff and
9 Counter-Defendant The Next Vietnam Projects Foundation, Inc., which
10 was to be created in part for the purpose of holding the Film, related
11 footage (including a number of interviews) and the rights thereto.

12 Koster eventually received approximately \$300,000 for his work on the Film,
13 most of which was raised from donors. Instead of honoring his agreement and living
14 up to his promises, however, Defendant Koster, after extended delay, ultimately
15 provided a slapdash Film riddled with historical inaccuracies. After several revisions
16 based on Plaintiffs’ input, without notice to Plaintiffs, and in breach of his agreement
17 and contrary to his representations, Defendant Koster attempted to sell the Film to
18 consumers by making it available for download on several websites, including
19 IMDB.com, eBay.com and Vimeo.com. He also registered the Film with the copyright
20 office, claiming that his company (Defendant Koster Films LLC) and Defendant BT
21 Productions, LLC (which has since settled) own the copyrights in the Film, and refused
22 to give copies of the Film or the underlying footage (including the interviews) to
23 Plaintiffs. Plaintiffs, accordingly, brought this action.

24 Defendant, after being served via publication, answered the Complaint on May
25 19, 2023. (Dkt. No. 53.) On June 10, 2023 Defendant filed an amended answer and
26 counterclaims, which included a claim for conversion based, in part, on alleged
27 DMCA takedown notices sent by Ms. Nguyen and settlement communications with
28 former Defendants Brian Tooker and Tooker Productions LLC (the “Tooker

Defendants”). (Amended Answer and Counterclaims, Counterclaims at ¶¶ 13-17.) (Dkt. No. 60.) Plaintiffs responded with a Motion to Strike under California’s anti-SLAPP Statute (Dkt. No. 63.) The Court then granted Defendant’s request for leave to amend his counterclaims, and Defendant served his Amend Counterclaims on September 8, 2023, which, by order of the Court, rendered Plaintiffs’ previous Motion to Strike moot. (Dkt. No. 87.)

The Amended Counterclaims allege claims for conversion and under 17 U.S. Code § 512(f) (which concerns knowing misrepresentations made in connection with the DMCA copyright takedown process). In support of the conversion claim, Defendant again alleges: (1) that Ms. Nguyen sent DMCA takedown notices regarding the Film, and (2) that Plaintiffs, as a part of a settlement with the Tooker Defendants regarding this action, instructed the Tooker Defendants not to release the Film, interviews and other related property to Defendant. (Amended Counterclaims at ¶¶ 50, 63-65; *id.* at Causes of Action, ¶¶ 8-14.) Defendant further alleges that these acts have caused him “economic and noneconomic” harm “resulting in loss of income, reputation and business opportunities” (Amended Counterclaim at Causes of Action, ¶ 17.)

III. KOSTER’S COUNTERCLAIM FOR CONVERSION SHOULD BE STRICKEN UNDER THE ANTI-SLAPP STATUTE

A. Legal Standard Governing Anti-SLAPP Motions

California’s anti-SLAPP statute was enacted to provide a mechanism for courts “to dismiss at an early stage non-meritorious litigation meant to chill the valid exercise of the constitutional rights of freedom of speech and petition in connection with a public issue.” *Damon v. Ocean Hills Journalism Club*, 85 Cal. App. 4th 468, 473 (2000) (quoting *Sipple v. Found. for Nat’l Progress*, 71 Cal. App. 4th 226, 235 (1999)). The anti-SLAPP statute provides that:

A cause of action against a person arising from any act of that person in furtherance of the person’s right of petition or free speech under the

1 United States Constitution or the California Constitution in connection
 2 with a public issue shall be subject to a special motion to strike, unless
 3 the court determines that the plaintiff has established that there is a
 4 probability that the plaintiff will prevail on the claim.

5 Cal. Civ. Proc. Code § 425.16(b)(1).

6 Evaluation of an anti-SLAPP motion proceeds in two steps. First, the court
 7 decides whether the respondent has made a *prima facie* showing that the claimant's
 8 suit arises from an act in furtherance of respondent's right of petition or free speech.
 9 *Vess v. Ciba-Geigy Corp.*, 317 F.3d 1097, 1110 (9th Cir. 2003). The respondent can
 10 make such a showing by establishing that claimant's suit "aris[es] from" an act "in
 11 furtherance" of respondent's right to free speech "in connection with a public issue."
 12 Cal. Civ. Proc. Code § 425.16(b)(1). The anti-SLAPP statute defines such protected
 13 activities to include any statements "made in connection with an issue under
 14 consideration . . . by a . . . judicial body." *Id.* at §§ 425.16(e)(2). The anti-SLAPP
 15 statute expressly provides that it should be construed broadly to ensure the full
 16 protection of free speech. *Id.* at § 425.16(a) ("[C]ontinued participation in the matters
 17 of public significance . . . should not be chilled through the abuse of the judicial
 18 process. To this end, this section shall be construed broadly.").

19 Once the respondent makes a showing that the claimant's suit arises from an act
 20 in furtherance of respondent's right of petition or free speech, the burden shifts to the
 21 claimant to demonstrate a probability of prevailing on the challenged claim. *Id.* at §
 22 425.16(b).

23 **B. Defendant's Counterclaim For Conversion Is Subject To**
 24 **California's Anti-SLAPP Statute Because It Arises Out of Acts In**
 25 **Furtherance Of Plaintiffs' Rights To Free Speech**

26 In determining whether a statement was made "in connection with an issue
 27 under consideration or review by a . . . judicial body" under section 425.16(e)(2) and
 28 therefore protected by the anti-SLAPP Statute, "courts look to the litigation privilege

as an aid” because “the two statutes serve similar policy interests.” *Neville v. Chudacoff*, 160 Cal.App.4th 1255, 1263 (2008); CCP § 425.16(e)(2). California’s litigation privilege, codified in Civil Code § 47(b), shields any “communication (1) made in judicial or quasi-judicial proceedings; (2) by litigants or other participants authorized by law; (3) to achieve the objects of the litigation; and (4) that [has] some connection or logical relation to the action.” *Action Apartment Ass’n, Inc. v. City of Santa Monica*, 163 P.3d 89, 95 (Cal. 2007) (quoting *Silberg v. Anderson*, 50 Cal.3d 205, 212 (1990)). The privilege “applies without regard to malice or evil motives [and is thus] characterized as ‘absolute.’” *B-K Lighting, Inc. v. Vision3 Lighting*, 2008 WL 11286080, *6 (2008) (quoting *Brown v. Kennard*, 94 Cal.App.4th 40, 45 (2001)). The privilege “is not limited to statements made during a trial or other proceedings, but may extend to steps taken prior thereto, or afterwards.” *Rusheen v. Cohen*, 37 Cal.4th 1048, 1057 (2006); *Digerati Holdings, LLC v. Young Money Ent., LLC*, 194 Cal. App. 4th 873, 889 (2011) (a prelitigation communication is protected by the litigation privilege if it “relates to litigation that is contemplated in good faith and under serious consideration”) (citation and internal quotation marks omitted).

Here, the conversion counterclaim is based on alleged DMCA takedown notices and Plaintiffs’ alleged communication, in a settlement agreement, to the Tooker Defendants to the effect that the Tooker Defendants were not to release the Film, interviews and other property to Defendant. (Amended Counterclaims, Counterclaim at ¶¶ 11 and 13 - 15.) This alleged conduct is all protected by the anti-SLAPP Statute.

It is well-settled that communications, such as DMCA takedown notices, “with companies doing business or contemplating business with Defendants and relating to the alleged infringement of Plaintiff’s intellectual property that form the basis of the present litigation,” are “protected activities covered by the Anti-SLAPP statute.” *Sparrow LLC v. Lora*, No. CV-14-1188-MWF (JCX), 2014 WL 12573525, at *4 (C.D. Cal. Dec. 4, 2014); *id.* at **3-4 (C.D. Cal. 2014) (finding that “cease and desist letters and other statements to third parties” are protected under the anti-SLAPP statute

1 because they “relate to the substantive issues in the litigation” and “are directed to
 2 persons having an interest in the litigation, as they could well serve as witnesses to
 3 Defendant’s wrongdoing”); *Beyond Blond Productions, LLC v. Heldman*, 2021 WL
 4 4859972, at **5-7 (C.D. Cal. 2021) (takedown notice and letter concerning issues
 5 “connected with this litigation” protected by anti-SLAPP statute); *TP Link USA*, 2020
 6 WL 3063956, *7 (communications to Amazon identifying listings that offered
 7 counterfeit products protected by anti-SLAPP statute); *Moonbug Entertainment*, 2022
 8 WL 580788 at **12-13 (DMCA notices to YouTube protected by anti-SLAPP statute).
 9 The alleged DMCA takedown notices sent by Ms. Nguyen are therefore protected
 10 activity under the anti-SLAPP Statute.

11 The alleged settlement communication to the Tooker Defendants is also
 12 protected by the anti-SLAPP Statute. The litigation privilege, and, accordingly, the
 13 anti-SLAPP statute, is “applicable to any communication . . . permitted by law in the
 14 course of a judicial proceeding to achieve the objects of the litigation, even though the
 15 publication is made outside the courtroom and no function of the court or its officers
 16 is involved.” *Silberg v. Anderson*, 50 Cal. 3d 205, 212 (1990), as modified (Mar. 12,
 17 1990). The alleged settlement communication was made between parties to the
 18 litigation, as part of a settlement of claims made in this litigation, for the purpose of
 19 achieving some of the express objects of this litigation – vindicating Plaintiffs’ rights
 20 to the Film and the interviews. The anti-SLAPP statute therefore applies. *Id.*; *see*
 21 *Navellier v. Sletten*, 29 Cal. 4th 82, 90, 52 P.3d 703 (2002). *Navellier* is instructive.
 22 In that case, the plaintiffs “complain[ed] about [the defendant’s] alleged negotiation,
 23 execution, and repudiation of the Release,” that allegedly limited the types of claims
 24 the defendant could bring, and relied on that release in their motion to dismiss the
 25 defendant’s counterclaims.” The “negotiation and execution of the Release, therefore”
 26 involved statements made in connection with an issue under consideration by a judicial
 27 body under Section 425.16(e)(2), and claims based on that conduct were subject to the
 28 anti-SLAPP Statute. *Navellier*, 29 Cal. 4th at 90. Similarly, Defendant here seeks to

1 impose liability on Plaintiffs by virtue of their communications in a settlement
2 agreement with former defendants concerning this suit. Indeed, by asserting a claim
3 based on Plaintiffs' settlement communications with the Tooker Defendants,
4 Defendant has made those communications an issue under consideration by a judicial
5 body, just as the *Navellier* plaintiffs made their release such an issue by raising it in
6 their motion to dismiss. The alleged settlement communication is therefore also
7 protected by the anti-SLAPP Statute.

8 Moreover, even if the alleged settlement communication were not protected by
9 the anti-SLAPP Statute (and it is), the conversion claim would still be subject to the
10 Statute because the gravamen of the claim is the alleged DMCA takedown notices.
11 Defendant alleges that he suffered economic damages, including economic harm, loss
12 of income, and lost business opportunities. (Amended Counterclaim at Causes of
13 Action, ¶ 17.) Defendant, however, only alleges that he has ever tried to
14 commercialize the Film itself, does not identify any economic harm other than his
15 inability to release and distribute the Film, and does not allege that he has ever
16 attempted to commercialize the interviews or any other property that Plaintiffs
17 allegedly converted. Further, Defendant has already conceded during meet and confer
18 that he has a copy of the Film. (Declaration of Jacob Poorman at ¶ 3.) Thus, the only
19 misconduct alleged in support of the conversion claim that could have caused
20 Defendant the economic harms he alleges are the DMCA takedown notices that
21 purportedly interfered with his ability to distribute the Film. The gravamen of the
22 conversion claim, therefore, is the DMCA takedown notices, which are protected by
23 the anti-SLAPP statute. *See Beyond Blond Productions, LLC v. Heldman*, 2021 WL
24 4859972, at *4 (C.D. Cal. 2021) ("The Court finds the gravamen of Beyond Blond's
25 claims is that Defendants allegedly falsely represented to others that Beyond Blond
26 infringed their copyright and trademark, leading to the suspension of Beyond Blond's
27 Amazon account. This occurred through communications to two main parties:
28 takedown notices issued to Amazon, FAC ¶ 18, and emails sent to Warner Brothers,

1 who then contacted Amazon, Opp'n at 15. There are other actions that occurred, such
 2 as Defendants' filing of a trademark application, but the Court focuses on these two
 3 sets of communications for the state law claims as the apparent 'direct and proximate
 4 cause of damage to Beyond Blond because Amazon relied on those bad faith notices
 5 and disabled Beyond Blond's seven videos and, on information and belief, issued
 6 strikes against Beyond Blond's account.'").

7 **C. Koster Will Not Be Able to Show A Probability of Prevailing On His**
 8 **Claim for Conversion .**

9 Once a respondent carries its burden under Section 425.16 of showing that the
 10 claimant's claims are based on acts in furtherance of respondent's free speech rights,
 11 "the burden shifts to the opposing party to demonstrate the probability that it will
 12 prevail on the merits of the claim." *Salma v. Capon* 161 Cal.App.4th 1275, 1283
 13 (2008). To meet this requirement, a claimant cannot rely on allegations in the
 14 complaint, but must set forth evidence that would be admissible at trial.
 15 *Overstock.com, Inc. v. Gradient Analytics, Inc.* 151 Cal.App.4th 688, 699 (2007);
 16 *Industrial Waste & Debris Box Serv., Inc. v. Murphy* 4 Cal.App.5th 1135, 1155 (2016)
 17 (plaintiff must present "competent and admissible evidence" that "substantiate[s] the
 18 legal sufficiency of their claim") (citations omitted). That evidence must be sufficient
 19 to support a judgment in claimant's favor if proved at trial. *Anderson v. Geist* (2015)
 20 236 Cal.App.4th 79, 85; *see Murphy*, 4 Cal.App.5th at 1155 ("[I]t is not sufficient that
 21 plaintiff's complaint survive a demurrer."). Defendant will be unable to meet that
 22 burden.

23 Defendant has failed to allege and cannot allege his claim for conversion
 24 adequately. As set forth above, Defendant's conversion counterclaim arises from
 25 communications protected by, and absolutely immune under, California's ligation
 26 privilege. Moreover, to the extent Defendant's conversion claim is based on the
 27 DMCA notices, the claim is not cognizable. The DMCA notices allegedly interfered
 28 with Defendant's ability to *distribute* the Film, but Defendant does not allege that they

1 prevented him from accessing his alleged property, allowed Plaintiffs to take
 2 possession of the property, destroyed the property, or constituted a refusal to return
 3 the property, as required to state a claim for conversion. *See* CACI No. 2100.

4 Defendant therefore has no likelihood of prevailing on his claim for conversion,
 5 both because it is barred by the litigation privilege and because it is inadequately
 6 alleged. This Court should therefore strike the counterclaim for conversion.

7 **IV. IN THE ALTERNATIVE, DEFENDANTS' COUNTERCLAIMS**
 8 **SHOULD BE DISMISSED FOR FAILURE TO STATE FACTS**
 9 **SUFFICIENT TO SUPPORT A CLAIM FOR RELIEF**

10 If the Court concludes that the anti-SLAPP statute does not apply to Defendant's
 11 counterclaim for conversion, Plaintiffs respectfully submit that it should, in the
 12 alternative, dismiss those claims under Federal Rule of Civil Procedure 12(b)(6).

13 **A. Legal Standard Governing FRPC Rule 12(b)(6) Motions to Dismiss**

14 A court may dismiss a claim or complaint where ““there is no cognizable legal
 15 theory or an absence of sufficient facts alleged to support a cognizable legal theory.””
 16 *Shroyer v. New Cingular Wireless Servs., Inc.*, 622 F.3d 1035, 1041 (9th Cir. 2010)
 17 quoting *Navarro v. Block*, 250 F.3d 729, 732 (9th Cir. 2001); see also Fed. R. Civ. P.
 18 12(b)(6). Defendant's counterclaim for conversion is not a cognizable claim and
 19 should therefore be dismissed pursuant to Rule 12(b)(6), for the reasons set forth
 20 above.

21 **V. KOSTER SHOULD BE DENIED LEAVE TO AMEND**

22 “An amendment is futile when ‘no set of facts can be proved under the
 23 amendment to the pleadings that would constitute a valid and sufficient claim or
 24 defense.’” *Missouri ex rel. Koster v. Harris*, 847 F.3d 646, 656 (9th Cir. 2017)
 25 (quoting *Miller v. Rykoff– Sexton, Inc.*, 845 F.2d 209, 214 (9th Cir. 1988)). Here, no
 26 amount of detail that Defendant might add to his counterclaim for conversion can
 27 change its fundamentally defective nature because it is based on conduct that is
 28 absolutely immune under the litigation privilege. Moreover, Defendant has already

1 been given an opportunity to resolve the defects in his conversion claim and has
2 demonstrated he is unable to do so. Leave to amend, therefore, would be futile and
3 should be denied.

4 **VI. CONCLUSION**

5 For the foregoing reasons, Plaintiffs respectfully request that this Court grant
6 Plaintiffs' Motion to Strike and strike the counterclaim for conversion against them,
7 with prejudice. Should the Court grant Plaintiffs' Motion, Plaintiffs' respectfully
8 request leave to file a motion for the attorneys' fees to which they would be entitled
9 as the prevailing party under California Code of Civil Procedure 425.16(c)(1). In the
10 alternative, Plaintiffs respectfully request that the Court dismiss the counterclaim
11 pursuant to Rule 12(b)(6) for failure to state a claim upon which relief could be
12 granted.

13
14 DATED: September 22, 2023

PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP

15
16 By: /s/ Jacob K. Poorman

17 Jack Shaw
18 Jacob K. Poorman
19 *Attorneys for Plaintiffs*
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